

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: NATIONAL FOOTBALL LEAGUE  
PLAYERS' CONCUSSION INJURY LITIGATION**

Kevin Turner and Shawn Wooden, on behalf of  
themselves and others similarly situated,

Plaintiffs

v.

National Football League and NFL Properties, LLC,  
successor-in-interest to NFL Properties, Inc.,

Defendants.

No. 2:12-md-02323-AB  
MDL No. 2323

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

**MOTION FOR RELIEF UNDER ARTICLE XXVII OF THE SETTLEMENT  
AGREEMENT OR FOR RELIEF FROM JUDGMENT**

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**MOTION FOR RELIEF UNDER ARTICLE XXVII OF THE SETTLEMENT  
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Movants Kevin Henry and Najeh Davenport, by their attorneys Zuckerman Spaeder LLP, Edward Stone Law P.C., and JR Wyatt Law PLLC, move for relief under Article XXVII of the Settlement Agreement or for relief from the underlying judgment. In support of this motion, Mr. Henry and Mr. Davenport rely on the points and authorities in the accompanying brief, which Plaintiffs submit herewith and incorporate herein in their entirety.

Movants respectfully request oral argument on this motion.

Dated: August 25, 2020

Respectfully submitted,

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Attorneys for Plaintiffs

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\* *Pro hac vice* applications forthcoming.

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing was filed electronically with the Clerk of the Court on the 25<sup>th</sup> day of August 2020, to be served by operation of the Court's electronic filing system which sent notification of such filing via electronic mail to all counsel of record.

Dated: August 25, 2020

/s/ Steven N. Herman